

Pilot Medical Declaration

Consultation on amending the Air Navigation Order 2016 and UK Regulation (EU) No 1178/2011 (the UK Aircrew Regulation)

CAP 3218

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Introduction

1. The CAA are considering recommendations to the Department for Transport (DfT) to change the Pilot Medical Declaration (PMD) regulations, as contained in the [Air Navigation Order 2016](#) (“the Order”) and [UK Regulation \(EU\) No 1178/2011](#) (“the UK Aircrew Regulation”).
2. This consultation document presents potential amendments to the Order and UK Aircrew Regulation, principally concerning the provision of flight training where the instructor exercises their privileges on the basis of making a PMD.
3. The current PMD process was introduced in 2016 by [Article 163](#) of the Order. Originally it was only possible to exercise the privileges of a Private Pilot’s Licence (PPL) or National Private Pilot’s Licence (NPPL) and associated medical declaration on aircraft not subject to European aviation safety regulation – those described in Annex II to Regulation (EC) No 216/2008¹ and later Annex I to Regulation (EU) 2018/1139 (“non-EASA aircraft”).
4. Following EU Exit, in 2021 provision for the PMD was included in [MED.A.030 Medical certificates](#) of Annex IV (Part-MED) to the UK Aircrew Regulation. This allows pilots holding a licence issued under the UK Aircrew Regulation (a “Part-FCL licence”) to make a PMD and exercise the privileges of the Light Aircraft Pilot’s Licence (LAPL) while flying aircraft subject to UK Regulation (EU) 2018/1139 (“[Part 21 aircraft](#)”).
5. Exemption [ORS4 1629](#) was published in September 2025 and provides for less restrictive medical requirements than Article 163 of the Order when flying aircraft up to a maximum take-off mass (MTOM) of 2,000 kg. The exemption also allows student pilots training towards the Balloon Pilot Licence (BPL) and Sailplane Pilot Licence (SPL) to do so having made a PMD.
6. The 2021 amendments and [ORS4 1629](#) created inconsistencies in the privileges associated with making a PMD between pilot licences issued under the Order and those issued under the UK Aircrew Regulation, particularly regarding the privileges of the Flight Instructor (FI) or Class Rating Instructor (CRI) certificates. It is therefore proposed to bring more parity between the two regulations.
7. Subject to acceptance by the DfT, we anticipate the resulting amendments to the PMD regulations being laid before Parliament in the summer of 2026, and coming into force shortly thereafter.

¹ Regulation (EC) No 216/2008 was superseded in 2018 by Regulation (EU) 2018/1139.

8. We previously reviewed the PMD requirements and consulted on proposed changes in 2023. The associated [consultation response document](#) (CRD) was published in November 2024. The conclusions have yet to be implemented due to delays with developing a suitable IT system to support them. This more recent consultation does not supersede the earlier CRD, but will establish more consistency in the regulations, pending full adoption of the 2024 conclusions in the future.
9. As part of the rulemaking process, the CAA and DfT are required to assess the impact of regulatory changes on businesses and other relevant stakeholders. If you feel the changes proposed in this document will affect you financially, please indicate this in your comments when responding to the consultation.
10. The consultation is open from 05 February to 09 March. Comments should be submitted via our online response tool at: [Civil Aviation Authority - Citizen Space](#).

Chapter 1

The Air Navigation Order

Background

- 1.1 Article 163 of the Air Navigation Order 2016 (“the Order”) defines the requirements for making a pilot medical declaration (PMD), specifically that the pilot meets the medical standards for a Group 1 Licence issued by the Driver and Vehicle Licensing Agency (DVLA) and are not subject to any disqualifying medical criteria.
- 1.2 For pilot licences issued under the Order, Article 163 also defines the privileges that are permitted when the holder has made a PMD. The provision of flight instruction by a Flight Instructor (FI) or Class Rating Instructor (CRI) is permitted, however it must be:
 - Within the privileges of a Private Pilot’s Licence (PPL) issued or rendered valid under the Order; and
 - Provided towards a qualification for which instruction from the holder of a Part-FCL instructor certificate is not required.
- 1.3 The privileges of FI or CRI certificates issued under the Order are therefore limited to instruction towards licences and ratings that are also to be issued under the Order. There is an exception to this when exercising the privileges of a licence via Article 3, paragraph (3), of the UK Aircrew Regulation – a licence issued under the Order is deemed to comply with the UK Aircrew Regulation when exercising the privileges of a single engine piston (SEP) or touring motor glider (TMG) rating on a flight that may comply with Annex VII (Part-NCO) to UK Regulation (EU) 965/2012 (“the UK Air Operations Regulation”). The privileges of non-aircraft ratings, including instructor certificates, may also be used provided this done alongside exercising an SEP or TMG rating.
- 1.4 Flights with other-than-complex motor-powered aircraft that are either non-commercial or consist of flight training may comply with Part-NCO. This allows pilots with licences issued under the Order to fly [Part 21](#) aircraft within that scope, including when supported by a PMD made in accordance with Article 163 of the Order.
- 1.5 Article 3(3) therefore permits the use of an FI or CRI certificate issued under the Order on Part 21 aircraft when supported by a PMD. This is inconsistent with the privileges of an FI or CRI issued under Part-FCL, since they are not permitted to be exercised at all when supported by only a PMD. The disparity is an unintended consequence of amendments to the UK Aircrew Regulation in 2021.

Proposal

1.6 Article 163 would describe the privileges of an FI or CRI when supported only by a PMD, and in some instances make the privileges more limited than currently the case. It is also proposed to allow some instruction by holders of Part-FCL FI or CRI certificates, which is currently not permitted. See the amendments proposed in Chapter 2 for more detail.

1.7 We propose that FI or CRI certificate holders with a PMD may provide instruction towards:

- The NPPL(A) and associated class ratings;
- Revalidation and renewal of existing class ratings; and
- Differences training associated with an existing rating.

1.8 The proposed privileges take account of the risk of medical incapacitation and compliance with the ICAO requirement that a PPL (or higher licence) should be accompanied by a medical certificate of the appropriate class. For example, an applicant for a PPL requires a class 2 medical certificate, so we believe it appropriate that an FI providing instruction towards the PPL should also hold such a medical certificate.

1.9 We also propose to introduce a distinction between the medical requirements when flying aircraft up to 2,000 kg MTOM and those between 2,001 kg and 5,700 kg, reflecting the effect of the [ORS4 No. 1629](#) exemption, which has been in effect now for four years. Incorporating the different medical criteria based on the MTOM of the aircraft would allow for the removal of the exemption, improving clarity for stakeholders.

1.10 Note that it is still the longer-term aim to remove the taking of medication for psychiatric illness as a condition that automatically disqualifies making a PMD, however this would remain in place until the full conclusions of the PMD review published in November 2024 have been implemented.

1.11 There are no changes in relation to the PMD proposed to the privileges of the FI (microlight), FI (gyroplanes) or FI (TMG).

Draft amendments

1.12 Amendments are indicated by:

- New text: Grey highlight
- Deletions: ~~Strikeout~~

1.13 Please note that drafting below is only for the purposes of illustrating the policy intention, the final text of the regulation will likely be different.

1.14 Proposed amendments to Article 163:

163.—(1) In this article, a specified licence means—

(a) a National Private Pilot's Licence or United Kingdom Private Pilot's Licence; or

(b) a United Kingdom Commercial Pilot's Licence (Balloons) that is restricted to commercial operation and to the privileges of a United Kingdom Private Pilot's Licence (Balloons and Airships).

(2) Subject to paragraph (7), the holder of a specified licence, or of a licence which includes the privileges of a specified licence, may exercise any of the privileges of the specified licence if the holder has—

(a) a valid medical certificate issued under article 161;

(b) a medical certificate granted under Section 2 of Subpart A of Part-MED, including one which is valid for a Light Aircraft Pilot Licence issued under Part-FCL; or

(c) made a medical declaration in accordance with paragraph (3) which has not ceased to be valid in accordance with paragraph (4) and the holder complies with the conditions in paragraph (5).

(3) The holder of a licence makes a medical declaration in accordance with this article if they—

(a) ~~reasonably believe that they~~ to exercise their privileges in an aircraft with a maximum take-off mass of 2000 kg or less, if they—

(i) ~~reasonably believe that they~~ meet the medical requirements for a Group 1 Licence issued by the Driver and Vehicle Licensing Agency; and

(ii) are not ~~subject to a disqualifying medical condition taking~~ medication for any psychiatric illness or subject to such other medical criteria as the CAA may specify; or

(aa) to exercise their privileges in an aircraft with a maximum take-off mass of between 2001 kg and 5700 kg, if they

(i) ~~reasonably believe that they~~ meet the medical requirements for a Group 1 Licence issued by the Driver and Vehicle Licensing Agency; and

(ii) are not subject to a disqualifying medical condition.

(b) ~~if they~~ make a declaration to that effect to the CAA in such form and in such manner as may be required or specified by the CAA; and

(c) in the case of a licence holder aged 70 years or more, have made such a declaration within the previous three years.

(4) A declaration made in accordance with paragraph (3)—

(a) ceases to be valid if it is withdrawn;

(b) must be withdrawn by the holder if they no longer reasonably believe that they satisfy the requirements of paragraph (3);

(c) may be withdrawn by the CAA if it has reason to believe that the holder—

(i) no longer meets the medical requirements in paragraph (3)(a)(i) or (aa); or

(ii) is subject to a disqualifying medical condition.

(5) The holder of a licence who does not have a medical certificate and relies on satisfying the requirements of paragraph (3) may only exercise the privileges of the licence—

(a) in an aircraft with a maximum take-off mass of 5,700kg or less, or when a declaration is made in accordance with 3(a), a maximum take-off mass of 2,000 kg or less;

(b) with not more than three passengers on board;

(c) by day or when exercising the privileges of a night rating;

(d) in visual meteorological conditions or when exercising the privileges of an instrument meteorological conditions rating; and

(e) within the United Kingdom unless the holder has the permission of the competent authority for the airspace in which the aircraft is being flown; and

(f) when exercising the privileges of a Flight Instructor or Class Rating Instructor, is limited to the:

(i) training towards the NPPL(A) and PPL(G), including associated class ratings, revalidation and renewal;

(ii) training associated with the revalidation and renewal of class ratings endorsed on licences other than mentioned in (i);

(iii) provision of differences training in accordance with FCL.710 of the Aircrew Regulation or Schedule 8 of the Order.

(6) For the purposes of this article, “disqualifying medical condition” means any physical or mental condition or illness, or any history of such a condition or illness, including—

(a) any alcohol or drug abuse, addiction or misuse;

(b) any neurological condition;

(c) any functional disability;
(d) any surgery or medical treatment;
(e) any collapse, fainting or loss of consciousness;
(f) any history of (a) to (e); or
(g) such other medical conditions as the CAA may specify,
that might impair the safe operation of normal flight controls or render the licence holder unfit at any time to perform any function for which the licence is granted.

(7) The holder of a specified licence wishing to exercise night rating privileges must additionally meet the colour vision requirements of MED.B.075 of Part-MED in order to be so entitled.

[ends]

Please submit any comments regarding Article 163 via the online response tool.

Chapter 2

The Aircrew Regulation

Background

- 2.1 The privileges of Part-FCL licences when supported by a PMD are described in [MED.A.030](#) of Annex IV (Part-MED) to the UK Aircrew Regulation. Part-MED also provides that the privileges of a Balloon Pilot Licence (BPL) or Sailplane Pilot Licence (SPL) may also be exercised with a PMD.
- 2.2 Having made a PMD, a Part-FCL PPL holder is restricted to Light Aircraft Pilot Licence (LAPL) privileges – single engine piston aircraft up to 2,000 kg MTOM in the relevant category, with no more than four people onboard the aircraft. A LAPL holder may not receive renumeration for flying, and a Flight Instructor (FI) certificate may not be endorsed on a LAPL.
- 2.3 Sailplane or Balloon FI certificate holders may already provide flight instruction supported by a PMD, and there are no plans to change this.

Proposal

- 2.4 We propose to permit the exercise of limited privileges for Part-FCL FI and CRI certificate holders who have made a PMD. The scope of permitted instruction would be same as that proposed in Chapter 1 for Article 163 of the Order.
- 2.5 We would also provide that a student pilot training towards a BPL or SPL can do so having made a PMD – currently this is permitted by [ORS4 No. 1629](#), but would be incorporated into Part-MED.

Draft amendments

- 2.6 Amendments are indicated by:
 - New text: Grey highlight
 - Deletions: ~~Strikeout~~
- 2.7 Please note that drafting below is only for the purposes of illustrating the policy intention, the final text of the regulation will likely be different.
- 2.8 Proposed amendments to MED.A.030:

MED.A.030

(a) A student pilot shall not fly solo unless that student pilot holds a medical certificate, as required for the relevant licence. In the case of the sailplane pilot

licence (SPL) or balloon pilot licence (BPL), the student pilot may make a medical declaration.

(b) An applicant for a licence, in accordance with Annex I (Part-FCL), shall hold a medical certificate issued in accordance with this Annex (Part-MED) and appropriate to the licence privileges applied for. In the case of the SPL or BPL, the applicant may have made a medical declaration.

(c) Subject to (cc), when exercising the privileges of a:

(1) light aircraft pilot licence (LAPL), a ~~balloon pilot licence (BPL)~~ issued in accordance with Annex III (Part-BFCL) to Commission Regulation (EU) 2018/395, or a ~~sailplane pilot licence (SPL)~~ issued in accordance with Annex III (Part-SFCL) to Commission Implementing Regulation (EU) 2018/1976, the pilot shall hold at least a valid LAPL medical certificate or have made a medical declaration (except where the pilot is exercising the privileges of a LAPL in respect of a turbine engine helicopter, in which case the pilot shall hold at least a valid LAPL medical certificate);

(2) private pilot licence (PPL), the pilot shall hold at least a valid class 2 medical certificate (~~except where the pilot is exercising the privileges of a LAPL in respect of aircraft other than turbine engine helicopters, in which case the pilot shall hold at least a valid class 2 medical certificate or have made a medical declaration~~);

(3) BPL for the purpose of:

(i) commercial passenger ballooning, the pilot shall hold at least a valid class 2 medical certificate ~~or (except where more than 4 persons are on board the aircraft) have made a medical declaration~~;

(ii) commercial operation other than commercial passenger ballooning, with more than 4 persons on board the aircraft, the pilot shall hold at least a valid class 2 medical certificate;

(4) SPL for the purpose of commercial sailplane operations other than those specified in Article 3(2) of Commission Implementing Regulation (EU) 2018/1976, the pilot shall hold at least a valid class 2 medical certificate or have made a medical declaration;

(5) a commercial pilot licence (CPL), a multi-crew pilot licence (MPL) or an airline transport pilot licence (ATPL), the pilot shall hold a valid class 1 medical certificate.

(cc) The privileges of the private pilot licence (PPL) may be exercised without holding a class 2 medical where:

(i) The holder has made a medical declaration;

- (ii) Flights are conducted under VFR, or within the privileges of the Instrument Meteorological Conditions Rating;
- (iii) The aircraft flown has an MTOW of 2,000 kg or less and there are no more than four persons onboard;
- (iv) In the case of helicopters, the aircraft is not powered by turbine engines; and
- (v) Any provision of flight instruction or examination is limited to that associated with the National Private Pilot's Licence (Aeroplanes) issued under the Air Navigation Order 2016, the revalidation and renewal of class ratings, or differences training required by FCL.710.

(d) If a night rating is added to a PPL or LAPL, the licence holder shall be colour safe.

(e) If an instrument rating or en route instrument rating is added to a PPL, the licence holder shall undertake pure tone audiometry examinations in accordance with the periodicity and the standard required for class 1 medical certificate holders.

(f) A licence holder shall not at any time hold more than one medical certificate issued in accordance with this Annex (Part-MED).

[ends]

Please submit any comments regarding MED.A.030 via the online response tool